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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JENAIL H. NEWTON,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00971-GMN-GWF

**JOINT STIPULATION AND ~~[PROPOSED]~~  
ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR  
REVERSAL/REMAND.**

**(Third Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from April 1, 2019 to **May 1, 2019**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) was out of the office for 2 ½ weeks with the flu/pneumonia. Counsel was also subsequently out due to her ongoing chronic migraines. Counsel also has over 80+ active social security matters, which require two or more dispositive motions per week until mid-May. Due to unexpected leave and heavy workload, Counsel for Defendant respectfully requests additional time to respond to the issues raised in

1 Plaintiff's Motion. Defendant apologizes for the belated request for extension, but had personal  
2 family emergency and sought and filed an extension of time as soon as reasonably practicable. The  
3 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

4 Respectfully submitted,

5 Dated: April 1, 2019

6 /s/ Joshua Harris

7 (\*as authorized by email on April 1, 2019)

8 JOSHUA HARRIS

9 Attorney for Plaintiff

10 Dated: April 1, 2019

11 NICHOLAS A. TRUTANICH

12 United States Attorney

13 DEBORAH LEE STACHEL

14 Regional Chief Counsel, Region IX

15 Social Security Administration

16 By /s/ Tina L. Naicker

17 TINA L. NAICKER

18 Special Assistant U.S. Attorney

19 Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22 DATED: April 2, 2019

23 

24 THE HONORABLE GEORGE W. FOLEY, JR.  
25 UNITED STATES MAGISTRATE JUDGE  
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